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9	UNITED STATES	DISTRICT COURT
10		LIFORNIA, FRESNO DIVISION
11	EASTERN DISTRICT OF CAL	AFORMA, FRESHO DIVISION
12	MADELIA ZEDEDA OLIVADEC	C N. 124 . 01020 H T CAD
13	MARTHA ZEPEDA OLIVARES, individually and on behalf of the	Case No. 1:24-cv-01039-JLT-SAB District Judge: Jennifer L. Thurston
14	ESTATE OF MAXIMILIANO SOSA, JR.; MAXIMILIANO SOSA, SR.,	Magistrate Judge: Stanley A. Boone
15	Plaintiffs,	CTIDIII ATION and DEOLIECT TO
16	v.	STIPULATION and REQUEST TO CONSOLIDATE CASES;
17	CITY OF FRESNO, UNKNOWN	[PROPOSED] ORDER
18	LAW ENFORCEMENT OFFICERS, POLICE CHIEF PACO	
19	BALDERRAMA and DOES 1-30,	
20	Defendants.	Trial Date: N/A
21		
22	MARIA SOSA, L.S. by and through guardian ad litem MARIA SOSA, M.S.	
23	guardian ad litem MARIA SOSA, M.S. by and through guardian ad litem JENNIFER LOPEZ, individually and as successors-in-interest to Maximiliano	
24	successors-in-interest to Maximiliano Sosa,	
25	Plaintiffs,	
26	V.	
27	CITY OF FRESNO and DOES 1-5,	
28	Defendants.	

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28

1	IT IS STIPULATED and r	espectfully requested that both of these matters
2	should be consolidated for all fur	ther proceedings pursuant to F.R.Civ.P., Rule
3	42(a), as the parties believe that of	consolidation (rather than the current relation or
4	would serve to streamline discove	ery and all further proceedings for the parties ar
5	the Court. Furthermore, these act	ions presently before the court involve commor
6	questions of law and fact.	
7		
8	DATED: December 26, 2024	Respectfully submitted,
9		MANNING & KASS
10		ELLROD, RAMIREZ, TRESTER LLP
11		By: /s/ Míldred K. O'Linn
12		Mildred K. O'Linn, Esq.
13		Lynn L. Carpenter, Esq. Maya R. Sorensen, Esq.
14		Attorneys for Defendants, CITY OF
15		FRESNO; UNKNOWN LAW ENFORCEMENT OFFICERS, and
16		POLICE CHIEF PACO BALDERRAM
17	DATED: December 26, 2024	Respectfully submitted,
18	B11125. Become 20, 2021	respectivity suchineca,
19		LAW OFFICE OF KEVIN G. LITTLE
20		By: /s/ Kevin Little
21		Kevin G. Little, Esq.
22		Michelle Tostenrude, Esq. Attorneys for Plaintiff, MARTHA
23		ZEPEDA OLIVARES, individually and
24		behalf of the ESTATE OF MAXIMILIANO SOSA, JR.
25		MAXIMILIANO SOSA, SR
26		
27		

hould be consolidated for all further proceedings pursuant to F.R.Civ.P., Rule
(2(a), as the parties believe that consolidation (rather than the current relation only)
would serve to streamline discovery and all further proceedings for the parties and
he Court. Furthermore, these actions presently before the court involve common
questions of law and fact.

## VING & KASS OD, RAMIREZ, TRESTER LLP

/s/ Mildred K. O'Linn ildred K. O'Linn, Esq. nn L. Carpenter, Esq. aya R. Sorensen, Esq. torneys for Defendants, CITY OF RESNO; UNKNOWN LAW NFORCEMENT OFFICERS, and OLICE CHIEF PACO BALDERRAMA

#### OFFICE OF KEVIN G. LITTLE

/s/ Kevin Little
Kevin G. Little, Esq.
Michelle Tostenrude, Esq.
Attorneys for Plaintiff, MARTHA
ZEPEDA OLIVARES, individually and on
behalf of the ESTATE OF
MAXIMILIANO SOSA, JR.
MAXIMILIANO SOSA, SR

### Case 1:24-cv-01039-JLT-SAB Document 16 Filed 01/10/25 Page 3 of 3

KASS	
MANNING	
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DATED:	December 26, 2	.024 Resi	pectfully	submitted,
				~,

## LAW OFFICE OF DALE GALIPO

By: /s/ Dale K. Galip	ipo	/s/	By:
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Dale K. Galipo
Cooper Alison-Mayne
Attorneys for plaintiffs Maria Sosa, L.S.,
and M.S.